From: Minter, Douglas [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0C1A47CA3AE847E2B7B818DA4734D7FD-MINTER, DOUGLAS]

Sent: 1/24/2020 10:33:55 PM

To: O'Connor, Darcy [oconnor.darcy@epa.gov]; Bahrman, Sarah [Bahrman.Sarah@epa.gov]; Arnold, Rick

[Arnold.Rick@epa.gov]; Robinson, Valois [Robinson.Valois@epa.gov]; Lucero, Adele [Lucero.Adele@epa.gov]; Chin,

Lucita [Chin.Lucita@epa.gov]

Subject: SOW/LOE Briefing for DB Final UIC Permits

Attachments: 2020DeweyBurdockTimeline.docx

Location: Pyrite

Start: 1/27/2020 4:30:00 PM **End**: 1/27/2020 5:30:00 PM

Show Time As: Tentative

Required O'Connor, Darcy; Bahrman, Sarah; Arnold, Rick; Robinson, Valois; Lucero, Adele; Chin, Lucita **Attendees**:

Hi Darcy: immediately below is an outline of the nature/scope of outstanding work for Dewey Burdock Final UIC Permit Issuance. The attached document proposes a detailed timeline (by month) which we believe is aggressive but still realistic.

Scope of Remaining Major Tasks:

- Review significant public comments to identify further changes to permits (VR/RA Lead).
- Coordinate with HQs Offices in addressing NRC concerns and identify any further changes to the Class III permit (DM Lead).
- Modify draft permits, and aquifer exemption ROD and supporting documents based on comments received (VR: Class III/AE Lead & RA: Class V Lead).
- Update Cumulative Effects Analysis (CEA) in response to comments (Lead TBD)
- Update Environment Justice (EJ) Document in response to comments (Lead TBD)
- Update Biological Assessment for ESA Compliance (OS-L Lead)
- RA Approval of Waiver for use of PVC well casing for the Class III wells (BS Lead)
- Review/Revise Response to Comments document prepared by Cadmus (VR/DM/OSL/RA/LC Co-Leads)
- Finalize our plan for compliance with NHPA and document effort (VR/MB Co-Leads)
- Finalize our tribal consultation process, including the response documents for each tribe describing how we took their concerns and comments into consideration (OS-L Lead).
- Compile/Organize/Index the administrative record (Paralegal and/or Student Volunteer Lead).
- Financial Assurance review of Powertech's surety bond or other financial instruments (BD Lead)
- HQs/Region 8 senior management/RA briefings (DM Lead)

This second set of bullets is offered to facilitate further brainstorming on how we may bring more resources to this effort.

Options for Procuring Additional Resources for Final UIC Permit Issuance:

- Student Volunteer (Document Management and/or Administrative Record)
- Paralegal (Administrative Record)
- Increased FTE investment within UIC Section (Omar, Douglas, Bruce, and vice-Sierra Lopez hire?)
- Postpone other UIC Section commitments (e.g., permit renewals and legacy permits)

- Delegate other UIC work to non-DB Team Members within Section (e.g., WOGCC AE backlog)
- Increase HQ funding of Cadmus contract hours for RTC, tribal consultation, and Class III technical support
- Recruit support on EJ and CEA from outside UIC Section
- Other ideas ??

Douglas